

FILED IN OPEN COURT
ON 9-10-2024
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC
JAG

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Code, Sections 1951 and 2.

COUNT TWO

On or about July 11, 2023, in the Eastern District of North Carolina, the defendant, TIMARCUS LAVONNTE BRITT, knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count One of this Indictment, and said firearm was brandished, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

At all times material to Count Three of the Indictment, the Speedway store located at 5068 NC 33 East in Greenville, North Carolina, was engaged in a commercial retail business in interstate and foreign commerce and in an industry which affects interstate and foreign commerce.

On or about July 11, 2023, in the Eastern District of North Carolina, the defendants, JALIEK MONTREAL GRANT and TIMARCUS LAVONNTE BRITT, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and did aid and abet each other and others both known and unknown to the Grand Jury in so doing, as set forth in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, that is, unlawfully taking and obtaining personal property from the person and in the presence of another, against that person's will by means of actual and threatened force, as set forth in Title 18, United States Code, Section 1951, of the aforementioned

Speedway store. Such incident constituting a violation of Title 18, United States Code, Sections 1951 and 2.

COUNT FOUR

On or about July 11, 2023, in the Eastern District of North Carolina, the defendant, TIMARCUS LAVONNTE BRITT, knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Three of this Indictment, and said firearm was brandished, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

At all times material to Count Five of the Indictment, the Speedway store located at 304 Washington Street in Williamston, North Carolina, was engaged in a commercial retail business in interstate and foreign commerce and in an industry which affects interstate and foreign commerce.

On or about July 11, 2023, in the Eastern District of North Carolina, the defendants, JALIEK MONTREAL GRANT and TIMARCUS LAVONNTE BRITT, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and did aid and abet each other and others both known and unknown to the Grand Jury in so doing, as set forth in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, that is, unlawfully taking and obtaining personal property from the person and in the presence of another, against that person's will by means of actual and threatened

force, as set forth in Title 18, United States Code, Section 1951, of the aforementioned Speedway store. Such incident constituting a violation of Title 18, United States Code, Sections 1951 and 2.

COUNT SIX

On or about July 11, 2023, in the Eastern District of North Carolina, the defendant, TIMARCUS LAVONNTE BRITT, knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Five of this Indictment, and said firearm was brandished, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT SEVEN

At all times material to Count Seven of the Indictment, the Speedway store located at 109 West Avenue in Robersonville, North Carolina, was engaged in a commercial retail business in interstate and foreign commerce and in an industry which affects interstate and foreign commerce.

On or about July 11, 2023, in the Eastern District of North Carolina, the defendants, JALIEK MONTREAL GRANT and TIMARCUS LAVONNTE BRITT, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, and did aid and abet each other and others both known and unknown to the Grand Jury in so doing, as set forth in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, that is, unlawfully taking and obtaining personal property from the person and in the

presence of another, against that person's will by means of actual and threatened force, as set forth in Title 18, United States Code, Section 1951, of the aforementioned Speedway store. Such incident constituting a violation of Title 18, United States Code, Sections 1951 and 2.

COUNT EIGHT

On or about July 11, 2023, in the Eastern District of North Carolina, the defendant, TIMARCUS LAVONNTE BRITT, knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Seven of this Indictment, and said firearm was brandished, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT NINE

On or about July 20, 2023, in the Eastern District of North Carolina, the defendant, TIMARCUS LAVONNTE BRITT, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm, and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

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FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any offense charged herein constituting "specified unlawful activity" (as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1)), or a conspiracy to commit such offense, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), as made applicable by 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or that were intended to be used in any offense identified in 18 U.S.C. § 924(d)(3), or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Personal Property:

- a) One Glock .40 caliber firearm with serial number AALH063 and related ammunition seized on July 20, 2023, during a search warrant at the residence of TIMARCUS LAVONNTE BRITT

b) One Taurus, Model G3c 9mm firearm with serial number ACG006499 and related ammunition seized on July 20, 2023, during a search warrant at the residence of TIMARCUS LAVONNTE BRITT

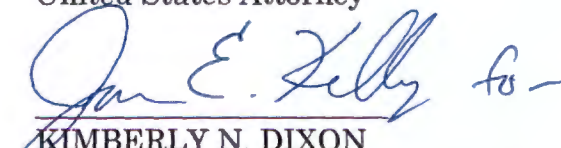
If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

Date: 9/10/24

MICHAEL F. EASLEY, JR.
United States Attorney


KIMBERLY N. DIXON
Assistant United States Attorney